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September 1, 1993

Marsha A. Adams
 5HSM - 5J
 Responsible Party Search Section
 77 West Jackson Boulevard
 Chicago, Illinois 60604-3590

Re: City of Toledo, Stickney Avenue Landfill and
 Tyler Street Dump Sites

Dear Ms. Adams:

Please be advised that the undersigned represents Bunting Bearings Corp. of Holland, Ohio (the "Company"). The Company has received and forwarded to us your request for information pursuant to Section 104(e) of CERCLA regarding the Stickney Avenue Landfill and Tyler Street Dump Sites in Toledo, Ohio. The Company recently received a similar request for information on the Dura Avenue Landfill in Toledo, Ohio, but after consultations with governmental officials, the Company was not required to respond due to the history of their business since to do otherwise would cause an administrative burden and expense that was not warranted under the circumstances. Our letter to Linda Beasley of your office is enclosed herewith and we believe provides the basis for not responding further at this time. We presume that if after reviewing the matters set forth herein you believe Bunting Bearings Corp. should otherwise comply with the request for information that you will notify us so our client may take those steps it deems necessary.

I trust that if you disagree, you will contact me. Otherwise, I anticipate that the enclosed will be both informative for your purposes and to your satisfaction.

Very truly yours,

John W. Hilbert

JWH/vmm

Enclosure

5771-5

bc: Thomas Kwiatkowski
 Mark Boyle, Esq.
 L. E. Tosi, Esq.
 D. G. Haynam, Esq.

RECEIVED
 SEP 10 1993

SUPERFUND PROGRAM
 MANAGEMENT BRANCH

*ALSO ADMITTED IN MICHIGAN

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February 15, 1993

Ms. Linda Beasley
Emergency Support Section
U.S. Environmental Protection Agency, HSE-5J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Re: Bunting Bearings Corp.

Dear Ms. Beasley:

Please be advised that the undersigned represents Bunting Bearings Corp. of Holland, Ohio for the purpose of their response. They have received and forwarded to us your request for information pursuant to Section 104(e) of CIRCLA and Section 3007 of RCRA regarding the Dura landfill site. Pursuant to our discussions with Jack VanKley of the Ohio Attorney General's office on Tuesday, February 9, 1993, this letter is all that is required from our client at this point in time. We understand that if after reviewing the matters set forth herein you believe Bunting Bearings Corp. should otherwise comply with the request for information that you will notify us so our client may take those steps it deems necessary.

The time period for the request for information is from 1950 through 1980. Bunting Bearings Corp. was not in existence during this period of time. In fact, it was incorporated in Delaware on December 28, 1988 and had no assets until February 23, 1989.

On February 23, 1989, Bunting Bearings Corp. acquired from Eagle-Picher Industries, Inc. certain assets of its Bearings Division. Those assets were three manufacturing plants in Kalamazoo, Michigan, Mansfield, Ohio and Delta, Ohio, and two warehousing operations in Houston, Texas and Cerritos,

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TOLEDO, OHIO

Ms. Linda Beasley

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February 15, 1993

California. The Delta plant is approximately 30 miles from the Dura landfill. Bunting Bearings Corp. did not acquire the Toledo, Ohio facilities of Eagle-Picher Industries. To the extent that any substances were deposited at the Dura landfill (and that is unknown to the management of Bunting Bearings Corp.), it likely would have been from the facility located at 715-55 Spencer Street in Toledo, Ohio. That property was sold in 1990 by Eagle-Picher Industries to R. G. Connelly, Inc. and the Toledo Zoo.

In order to assist you in this matter, the following information may be helpful to you. Bunting Brass and Bronze Company came into business sometime in the early 1900's with its offices located at 715-55 Spencer Street, Toledo, Ohio. Its primary business was a bronze foundry and machine shop for plain bearings and parts. In 1968, Bunting Brass and Bronze Company was sold to National Lead (now known as NL Industries, Inc.). Eagle-Picher Industries, Inc. acquired the Toledo facilities which had operated as the Bunting Brass Division of NL Industries and the Kalamzaoo facilities from NL Industries in December of 1980. At the time of the acquisition in 1980, Eagle-Picher owned and operated the Delta, Ohio and Mansfield, Ohio manufacturing plants and the Texas and California operations.

In summary, Bunting Bearings Corp. was not in existence during the period of time in question. The only facility that could have logically deposited any material at the Dura landfill was the Spencer Street facility which was not acquired by Bunting Bearings Corp. During the time period in question, Bunting Brass and Bronze Company (which has been out of business since 1968) and NL Industries, Inc. operated the Spencer Street facility. It also appears that Eagle-Picher Industries operated the facility for perhaps a week or two during December of 1980.

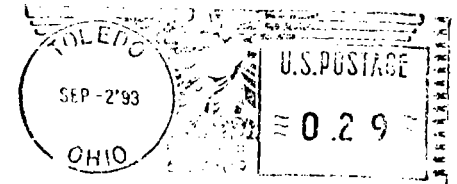
As previously noted, we trust this satisfies your inquiry as to Bunting Bearings Corp.

Very truly yours,


John W. Hilbert

JWH:vms
5771-5
cc: Jack VanKley

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